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Attorney for *Navy Federal Credit Union, Jeffrey L. Romig and Patricia Romig (formally known as Patricia Krause)*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SALMA AGHA-KHAN, MD., an individual
Plaintiff,

Case No.: 2:16-CV-02928-APG-PAL

VS.

**MOTION TO EXTEND TIME TO
RESPOND TO COUNTERCLAIM**

WELLS FARGO BANK, NA, a US Bank; WELLS FARGO FINANCIAL NATIONAL BANK, a National Banking Association; WELLS FARGO HOME MORTGAGE, a Wells Fargo Bank, NA subsidiary; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., a Delaware agency/corporation, form unknown; MERSCORP HOLDINGS INC, holding/parent company of MERS Inc.; TBI MORTGAGE COMPANY, a mortgage company; GMAC MORTGAGE, LLC FKA GMAC MORTGAGE CORPORATION, a financial lending business; OCWEN FINANCIAL CORPORATION, a financial concern, form unknown; MARTIN CONVEYANCING CORP AKA MARTIN CONVEYANCING CORPORATION, a lending corporation form unknown; EXECUTIVE TRUSTEE SERVICES, LLC, a defunct Delaware company form unknown; FIRST AMERICAN TITLE COMPANY, a title agency form unknown; FIRST AMERICAN TITLE INSURANCE COMPANY, a title insurance company form unknown; ROUTH CRABTREE OLSEN PS, a law firm in California; EDWARD T. WEBER, an individual and attorney at Routh Crabtree Olsen, PS; BRETT P. RYAN, an

1 individual and attorney at Routh Crabtree
2 Olsen, PS; JOHNATHAN J. DAMEN, an
3 individual and attorney at Routh Crabtree
4 Olsen, PS; JEFF ROMIG AKA JEFFREY L.
5 ROMIG, an individual; PATRICIA J.
6 KRAUSE, an individual; GREENPOINT
7 MORTGAGE FUNDING, INC, a mortgage
8 company form unknown; SERVICELINK
9 AKA SERVICELINK, LLC a business
10 organization form unknown; LSI TITLE
11 AGENCY INC, a title agency form
12 unknown; CHICAGO TITLE COMPANY, a
13 title company form unknown; FIDELITY
14 NATIONAL DEFAULT SOLUTIONS INC,
15 a company form unknown; NATIONWIDE
16 TITLE CLEARING, a title company form
17 unknown, AMANDA ROSE JONES, an
18 individual and Assistant Secretary for MERS
19 Inc; KRISTOPHER JAMES SANBERG, a
Wells Fargo employee; AND DOES 1
THROUGH 1000 INCLUSIVE,

Defendants.

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant-Intervenor NAVY FEDERAL CREDIT UNION (“Navy Federal”), by and through its attorney, Zachary T. Ball, Esq. of Ball Law Group, hereby requests an Order granting additional time, up to June 1, 2017 (10 days from the date of this Motion) to file a responsive pleading to Plaintiff/Counterclaimant SALMA AGHA-KHAN, M.D.’S (“Plaintiff/Counterclaimant”) Counterclaim to NAVY FEDERAL’S Complaint in Intervention [Document #82].

DATED this 22nd day of May, 2017.

THE BALL LAW GROUP

/s/ Zachary T. Ball, Esq.

Zachary T. Ball, Esq., NBN 8364
3455 Cliff Shadows Pkwy., Suite 150
Las Vegas, Nevada 89129
Attorney for *Navy Federal Credit Union, Jeffrey L. Romig and Patricia Romig (formally known as Patricia Krause)*

POINTS AND AUTHORITIES

Plaintiff/Counterclaimant's initial Complaint was filed on December 16, 2016, by filing his *in proper person* Complaint [Document #1] which spans 75 pages, asserts 16 causes of action, and includes 236 separate factual allegations that require individual responses.

Navy Federal, the moving party, filed a Complaint in Intervention to which Plaintiff/Counterclaimant answered and filed a Counterclaim against Nevada Federal on or about May 1, 2017 [Document #82]. This document contains an Answer to Navy Federal's Complaint in Intervention as well as a Counterclaim, the latter of which is 23 pages long (not including exhibits, the Answer, and the declaration of Plaintiff/Counterclaim, which bring the total length of the pleading to 68 pages). It multiple causes of action and contains 93 paragraphs which require individual responses.

It is this pleading (i.e. Plaintiff/Counterclaimant's Counterclaim against Nevada Federal [Document #82]) which is at issue in this Motion. A responsive pleading to said Counterclaim is due on the date of this filing (May 22, 2017). By way of this Motion, Navy Federal seeks a brief 10-day extension (which, by Navy Federal's calculation, is June 1, 2017) to file said responsive pleading. This request is made pursuant to F.R.C.P. 6(b)(1)(A) as Navy Federal's time period to respond to the Counterclaim has not yet passed.

Good cause exists to extend the time to respond to the Counterclaim because the length of the 68-page pleading (including exhibits), the complexity presented in the causes of action and the 93 paragraphs of factual allegations and prayers for relief, and the investigation and research that will be necessary to respond to all. The requested time is needed to investigate the facts and analyze the applicable law in order to prepare an appropriate response.

Moreover, it is unlikely Plaintiff/Counterclaimant will be prejudiced in any way by the minimal amount of time (10 days) Navy Federal is requesting to respond. This is a very short amount of time and will not impact the matter in any way.

CONCLUSION

For these reasons, Navy Federal respectfully requests an extension of time to respond to Plaintiff/Counterclaimant's Counterclaim until June 1, 2017.

DATED this 22nd day of May, 2017.

THE BALL LAW GROUP

IT IS SO ORDERED this 30th day of May, 2017.

Peggy A. Leen
United States Magistrate Judge

/s/ Zachary T. Ball, Esq.

Zachary T. Ball, Esq., NBN 8364
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Las Vegas, Nevada 89129
Attorney for *Navy Federal*
Credit Union, Jeffrey L. Romig and
Patricia Romig (formally known as
Patricia Krause)

CERTIFICATE OF SERVICE

The undersigned employee of THE BALL LAW GROUP hereby certifies that the foregoing **MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT** was electronically filed with the United States District Court on the 22nd day of May, 2017. Service of the foregoing document was made to all parties and counsel as identified on the Court-generated Notice of Electronic Filing and/or by depositing a true and correct copy of the same to the addresses shown below and by U.S. Mail, with first class postage prepaid there in a sealed envelope addressed to the following:

Salma Agha-Khan
3751 Motor Ave #34272
Los Angeles, CA 90034
Pro Se

/s/ Zachary T. Ball, Esq.
An Employee of the Ball Law Group